

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION**

DEBRA MOORE and husband,)	
DENNIS MOORE,)	
)	
Plaintiffs,)	
)	
VS.)	No. 3:22-cv-249
)	JURY DEMAND
WALMART INC., WAL-MART REALTY)	
COMPANY, WAL-MART REAL ESTATE)	
BUSINESS TRUST, WAL-MART)	
ASSOCIATES, INC., WAL-MART)	
STORES, INC, and WAL-MART)	
STORES EAST, LP,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Defendants hereby give notice of the removal pursuant to 28 U.S.C. § 1441 et. seq., of the following action filed against them: Debra Moore and husband, Dennis Moore v. Walmart Inc., Wal-Mart Realty Company, Wal-Mart Real Estate Business Trust, Wal-Mart Associates, Inc., Wal-Mart Stores, Inc., and Wal-Mart Stores East, LP; in the Circuit Court for Knox County, Tennessee, No. 2-182-22.

Copies of the summons are attached as Exhibit A. A copy of the complaint is attached as Exhibit B. Plaintiffs are citizens and residents of Grainger County, Tennessee.

Wal-Mart Stores East, LP, is the entity that operated the store on the date of this accident. Walmart Inc., Wal-Mart Realty Company, Wal-Mart Real Estate Business Trust, Wal-Mart Associates, Inc., and Wal-Mart Stores, Inc., are not proper parties to this action. Defendant may be referred to as “Wal-Mart” in this document. It is expected that Wal-Mart Stores East, LP, will be substituted as the sole proper defendant in this matter.

Wal-Mart Stores East, LP is a Delaware limited partnership. The general partner is WSE Management, LLC, a Delaware limited liability company. The limited partner is WSE Investment, LLC, a Delaware limited liability company. The sole member of WSE Management, LLC and WSE Investment, LLC is Wal-Mart Stores East, LLC fka Wal-Mart Stores East, Inc., an Arkansas limited liability company. The sole member of Wal-Mart Stores East, LLC is Walmart Inc. fka Wal-Mart Stores, Inc., a Delaware corporation. There are no other owners of Wal-Mart Stores East, LLC. Walmart Inc. is and was at the times plaintiff's complaint was filed and this matter being removed to this Court a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Bentonville, Arkansas. Walmart Inc. is a publicly traded company on the New York Stock Exchange and traded under the symbol WMT. No publicly traded entity owns more than 10% of Walmart Inc. The principal place of business for all entities mentioned is 702 S.W. 8th Street, Bentonville, Arkansas 72716.

Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. The parties are citizens of different states.

The amount in controversy is in excess of the federal jurisdictional requisite of \$75,000. The complaint prays for “A judgment for Debra Moore against Defendants for compensatory damages in a fair and reasonable sum to be determined by a jury in an amount not to exceed Two Hundred Fifty Thousand Dollars (\$250,000.00)” and “A judgment for Dennis Moore against Defendants for compensatory damages in a fair and reasonable sum to be determined by a jury in an amount not to exceed Fifty Thousand Dollars (\$50,000.00);”

Defendants were served with process on June 22, 2022. Fewer than thirty days have expired since service of process on Defendants. This Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b).

WHEREFORE, Defendants hereby give notice of the removal of this action pending in the Circuit Court of Knox County, Tennessee, to the United States District Court for the Eastern District

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of Tennessee, Northern Division, and request that the proceedings be held thereon.

/s/ Maria T. de Quesada
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Attorneys for defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was electronically filed with the Court and was served by U.S. Mail, postage prepaid, upon:

Lane Wolfenbarger
SHUTTLEWORTH PLLC
P.O. Box 473
Rutledge, TN 37861
slw@swlawpllc.com

this the 21st day of July, 2022.

/s/ Maria T. de Quesada